

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THE CHESTER COUNTY HOSPITAL

v.

INDEPENDENCE BLUE CROSS,  
QCC INSURANCE COMPANY,  
KEYSTONE HEALTH PLAN EAST, and  
KEYSTONE MERCY HEALTH PLAN

CIVIL ACTION

NO. 02-2746

**AMENDED PROPOSED DISCOVERY AND CASE MANAGEMENT PLAN**

Pursuant to the Court's Order at the pretrial conference, counsel on behalf of the respective parties submit for the Court's approval the following amended paragraph 3.b.to the Proposed Discovery and Case Management Plan as follows:

**b. Timing, Form, or Requirement For Disclosures  
under Rule 26(a), Agreed Upon Discovery Plan, and Plan  
for Dispositive Motions and Experts**

With due consideration of the numerous issues for discovery, as briefly outlined in the Report of Initial Attorneys' Conference and Proposed Discovery and Case Management Plan and further framed by the pleadings, the parties have agreed to the following discovery and motion schedule and jointly propose, together with language for inclusion in the Court's initial Rule 16 Scheduling Order, the following:

1. Except upon leave of Court, the parties will exchange their Rule 26(a)(1) disclosures no later than August 15, 2002. The parties may exchange Requests for Production of Documents within seven (7) business days after the exchange of their Rule 26(a)(1) disclosures. Afterwards, all non-expert discovery shall proceed forthwith and continue in such manner as will assure that all

requests for and responses to discovery will be served and noticed so as to be completed by no later than July 1, 2003.

2. At the end of non-expert discovery, expert disclosures shall be made in the following sequence: Plaintiff in support of its claims and Defendants in support of their counterclaims shall make Rule 26(a)(2)(B) disclosures by August 1, 2003. Defendants in their defense to Plaintiff's claims and Plaintiff in its defense to Defendants' counterclaims shall make Rule 26(a)(2)(B) disclosures by October 1, 2003. Any opinions and supporting evidence intended solely to contradict or rebut the same subject matter identified by another party shall be disclosed by no later than November 10, 2003. Expert depositions shall be completed by January 9, 2004.

3. Dispositive motions shall be filed no later than February 15, 2004. Responses shall be due by March 15, 2004, and replies by March 30, 2004.

Respectfully submitted this 8th day of July, 2002.

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